# State of Vermont

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September 28, 2001

MIKE SAUERTEIG
IRVING OIL CORPORATION
PO BOX 401
BANGOR ME 04402

RE: Sites Management Activity Completed (SMAC) for Irving Oil-Caledonia Bulk Plant
Brighton, VT (Site #97-2169)

Dear Mr. Sauerteig:

The Sites Management Section (SMS) has received the following reports and letters from Acadia Environmental concerning the bulk plant: (1) Phase II Environmental Assessment dated February 28, 1997, (2) Initial Site Investigation dated January 20, 1998, (3) Underground Storage Tank Assessment dated October 12, 1998, (4) Letters dated December 1, 1998, and February 23, 1999, concerning analytical results for Langlitz water supply well, (5) letter dated December 3, 1999, about contaminated soil stockpiled on property, (6) Surficial Soil Quality Evaluation dated June 6, 2000, and (7) Corrective Action Report dated August 27, 2001. Based on the above referenced reports, the Sites Management Section (SMS) has the following understanding of the site:

- As part of the Phase II site investigation, four soil borings were advanced in the presumed hydraulically downgradient direction of the three underground storage tanks (USTs) and one above ground tank at the site. The borings were stopped when refusal was encountered at depths ranging from 10 feet to 20 feet. **Groundwater was not found in the borings.**

- The highest photoionization detector (PID) reading was 517 parts per million (ppm) in a soil sample from boring B-2, which was collected from the upper four feet near the former above ground storage tank. The PID readings decreased with depth, which suggests that the petroleum contamination was from surface spills. A PID reading of 32 ppm was present at a depth of 9.5 feet in boring B-1, which is located next to the former loading rack.

- On October 6, 1998, three underground storage tanks (USTs) were removed: a 10,000-gallon diesel tank (Tank 1), a 20,000-gallon kerosene tank (Tank 2), and a 20,000-gallon fuel oil tank (Tank 3). The highest PID readings were near the fill pipes of the tanks. The highest PID readings (140 ppm) was at a depth of 3 feet near the fill pipe of Tank 3. The highest PID reading was from shallow soil samples (less than a depth of 2 feet) was 5 ppm.

- Surface soil in the rack area was heavily stained. A soil boring and a test pit indicates that the contamination is confined to the upper 3 to 4 feet. The highest PID reading was 115 ppm at a depth of 3 feet. Contaminated soils from ground surface to a depth of approximately 3 feet were removed from the rack area. Approximately 15 cubic yards of contaminated soil were excavated an temporarily stockpiled onsite. To ensure that the vertical extent was defined at the most heavily contaminated soils removed, Acadia Enviromental advanced a test pit within the excavation.. The PID readings in the test pit at depths of six and nine feet were 0 and 9 ppm respectively, indicating that the most contaminated soils were removed from this area.

(Over)

- During the week of September 13, 1999, petroleum contaminated soil, mainly from the Irving Mainway Station (Site #97-2170) in Island Pond, were removed and transported to the Waste USA landfill in Coventry, VT. A total 785.52 tons were taken to the landfill. Approximately 22 tons of the contaminated soil originated from the bulk plant.

- The closest receptors are water supply wells. There are two water supply wells within 500 feet of the bulk plant: the Langlitz well and the Cargill well. A water sample was collected from the Langlitz well on October 14, 1998, and on February 4, 1999. The results of the October 1998 sample showed no detectable concentrations of diesel range compounds. Methylene chloride and trichloroethene (TCE) were found at a low concentrations of 1 parts per billion (ppb) and 2 ppb, respectively. However, the same compounds were found in the method blank, which suggests a laboratory contaminant. As a precautionary measure, a water sample was collected again from the well in February 1999 and analyzed for volatile organic compounds (VOCs) using EPA Method 8260. No VOCs were detected in the second sampling round which supports the conclusion that VOCs detected in the October 1998 samples were likely laboratory contaminants. The Cargill water supply was sampled on June 25, 2001. No target VOCs were detected.

- Based on the results of additional soil samples that took place in 2000, shallow soils in the former AST/UST area contained total petroleum hydrocarbon (TPH) concentrations above 1,000 mg/kg. The maximum allowable concentration in surface soils is 1,000 mg/kg and 200 mg/kg for industrial and residential areas, respectively. Because residential homes and a school are located nearby, the SMS considers the 200 mg/kg as the appropriate standard. Therefore, the SMS required the upper two feet of soil within the former UST/AST to be removed.

- In June 2001, approximately 270 tons of soil were removed from the former UST/AST area and transported to the Coventry Landfill to be used as daily soil cover. This quantity was based on the receipt dated June 26, 2001 from the Landfill. The consultant used a combination field and laboratory testing method to confirm that the shallow petroleum contamination was removed. The highest TPH concentration of the six confirmatory laboratory samples collected along the perimeter of the excavated area was 17 mg/kg. Clean fill was placed in the excavated area.

Based on the above understanding of the site, the SMS believes that the residual contamination at the site does not pose an unreasonable risk to human health and safety or the environment. Therefore, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release current or past owners of any past or future liability associated with the contamination found at the site. It does, however, mean that the SMS is not requesting any additional work at this time.

If you have any questions or comments, please contact John Schmeltzer or me at (802) 241-3888.

Sincerely,

George Desch, Chief, P.E.
Sites Management Section

cc: Ralph Devereaux, Devereaux Enterprises
Ms. Alison Jones, Acadia Environmental Technology
Joel Cope, Administrative Assistant for the Town of Brighton

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